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June 10, 2022

VIA ECF

The Honorable Douglas E. Arpert
United State District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Gustavo Martínez v. City of Asbury Park et al.*, No. 3:20-cv-08710-AET-DEA

Dear Judge Arpert:

We serve as counsel for Plaintiff Gustavo Martínez in the above-captioned matter (the “Action”). We write jointly on behalf of all parties to provide a joint status report and respectfully request that the Court provide the parties an additional 30 days within which to either submit papers resolving the Action or provide a joint status report if circumstances prevent resolution of the matter by then.

On January 11, 2022, the parties reached a settlement agreement in principle at a settlement conference before Your Honor. The current deadline for the parties to submit papers resolving the Action or providing a joint status report is today, June 10, 2022.

To date, the parties have exchanged drafts of a settlement agreement, but they have not yet finalized the draft settlement agreement and those efforts remains ongoing. To provide the necessary time to finalize a settlement agreement, the parties respectfully request that the Court grant the parties an additional 30 days within which to either submit papers resolving the Action or provide a joint status report if circumstances prevent resolution of the matter by then. All parties consent to this joint request.

Respectfully submitted,

/s/ *Stephanie L. Silvano*

cc: All counsel of Record (via ECF)